

DATE: August 15, 2003

TO: Steve Schultz, Wastewater Systems Manager

FROM: Rod Cruze, Compliance and Monitoring Manager

RE: **OLD SEWAGE PLANT CONTAMINATED SLUDGE**

Steve,

This memo is in response to your request for information on my involvement and actions to date with regard to the contaminated material that was found at the old sewage treatment plant.

My first involvement was on July 11, 2003. I was told that a pipe connected to an old style sludge digester at the old treatment plant site had been broken by a demolition crew and that about 11,000 gallons of material, believed to be sewage sludge, had leaked out into a pit. The material along with about one-foot of soil from underneath the pooled liquid had been placed in a sludge drying bed at our facility. I was asked by you to prepare a written report for the Regional Water Board. I spoke with Charles Sperino and visited the site to get a better idea of what had happened. Two Regional Board staff members joined us in our inspection of the site. We looked at the excavation to assure ourselves that the spill had been contained. We also looked at the lower chamber of the digester that still contained over 40,000 gallons of material. We were told that this material had been sampled the previous day for priority pollutants. I completed and transmitted the report to the board on the same day.

I was out of the office until July 29, 2003. When I returned I was told that the remainder of the sludge had been transported to our plant and that it would likely be disposed of in a manor similar to our grit and screenings or, possibly, mixed with our sludge. I looked at the analysis to see if the sludge met the requirements for land application under the federal 503 regulations. I noted that the analysis seemed to be on a wet basis not a dry basis (corrected for sample moisture). I asked our lab to check with the outside lab since this would make a large difference. Based on my calculations we could not land apply the material if the adjustment was done. It turned out that they hadn't adjusted the results since they did not know what we were going to use them for. We requested a revised report. It is worth noting that the 503 regulations do not anticipate high levels of organics like PCBs in standard digested sludge, so there are no limits for these compounds.

On August 5, 2003 you mentioned that Tom Boyd had met with the Regional Board about the old plant property and had some questions about the sludge analysis. You asked me to call him and see if I might be able to answer his questions. Since this was the first time I was looking at the data in general as opposed to in the context of the 503 regulations, I needed new benchmarks. I knew that Coleen had been asked to research other possible limitations that might apply to the material, so I asked her for the Title 22 hazardous material limitations she had downloaded. It was at that time that I noticed that

the PCB levels were hazardous. I was skeptical since we almost never see any detectable PCBs in our sludge. I asked our lab manager to check with the contract lab to see if there might be an error. When they confirmed the results, I spoke with you. Under your direction, I reported the incident to the Regional Board and the Office of Emergency Services (Report # 03-3942) that afternoon.

I began a phone log when I made the first notifications and have been logging all conversations with regulatory personnel since that time. I will make it available upon request.

At 8:37 A.M. on August 7, 2003 I received a call from Najah Amin of the Regional Water Board. He was concerned about the underdrains in the sludge bed and if the material we were storing could have leaked out. I told him what I had been told, that the old beds were no longer connected to the treatment plant, and assured him that I would personally check to verify it. I contacted Greg Stenke and asked him to show me the system. He explained that the old drain line had been disconnected but that a sump had been placed at the end of the beds to collect any material that might get into the underdrain system. These liquids were then pumped to a treatment plant junction box ( I believe plant 1 primary effluent). When I asked him for a pump log I was told that the pump is on a float switch. It operated automatically. I asked Greg to disconnect and lock out the pump. He did so immediately.

In order to see if material had made its way to the sump from the storage bed, I suggested that we sample the water in the sump and resample the material in the bed to confirm the original analysis. We sampled that day. The samples were sent to a different lab that could expedite the analysis. The results showed low levels of PCBs in the sump water and confirmed the original sludge analysis for PCBs. At this point we had retained the services of a hazardous waste firm but my dealings with them was been minimal.

Acting on a request from the Legal Dept. to notify EPA, I filed a phone report with the National Response Center at 1:40 P.M. on August 7, 2003 (Report # 653-233).

Based on the sump results, on August 8, 2003 we sampled the sludge at our facility to see if we had a contamination problem. One sample from each of three days of production was sampled and analyzed for PCBs. No PCBs were detected in any of these samples or in the effluent sample taken the same day. This is a good indication that little, if any, of the PCB contamination entered the treatment waste stream. Soil samples were taken at the old site at the same time but I was not involved with that operation.

From that point on my involvement has been peripheral to the clean-up effort. I did make an initial contact with the department of Toxic Substances Control as requested on August 13, 2003. Per our discussion, I gave the contact name and number to Dion Castro.

Those are the highlights. If you would like any further clarification please ask.